



Data Privacy Statement for
Employees
NOTICE-SAF-CORPSEC-CPO-002

Safaricom Data Privacy Statement- Employees

1.0 Introduction

Safaricom Plc (hereinafter referred to as Safaricom) is committed to respecting and protecting your privacy in compliance with the applicable laws and obligations on data use and privacy.

In order to demonstrate this commitment, Safaricom has provided this Statement to explain to you how it collects, uses and protects employee information. This Statement should be read together with your employment contract. Where there is a conflict, this Statement will prevail.

This Statement applies to all employees, interns, candidates, volunteers and contractors.

2.0 Definitions

References to

2.1 “You” means:

- i) employee- the person who has executed an employment contract with Safaricom PLC.
- ii) Intern – person who has been onboarded by Safaricom as an intern for a specified period;
- iii) Volunteer – person who has volunteered to work in Safaricom and has been onboarded as a volunteer;
- iv) Candidate/Applicant- a person who applies for a role in Safaricom through the online portal and shares their personal information with us;
- v) Contractor- a person who has been contracted by Safaricom to offer certain services.

2.2 “Safaricom”, “we” or “us”, “our” and “ours” means Safaricom PLC. Our contact details are as follows:

SAFARICOM HOUSE
Waiyaki Way, Westlands
PO Box 66827, 00800 Nairobi
Tel: +254 722 00 4444
Helpdesk2@safaricom.co.ke

2.3 The word “**includes**” means that what follows is not necessarily exhaustive and therefore the examples given are not the only things/situations included in the meaning or explanation of that text.

3.0 Statement Details

3.1 Collection of Information

3.1.1 Safaricom collects your personal information with your knowledge when you do any of the following (please note that this list is not exhaustive):

You apply for recruitment purposes, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies and/or other background credit agencies.

You are in the course of carrying out job-related activities throughout the period of you working for us.

You take up any of the training, learning and development courses offered by Safaricom

You take up any of the employee benefits offered by Safaricom e.g Medical Insurance.

You use the creche facility for our childminding services. You should be aware that in this case the child's personal information will be collected and handled as described in this statement.

You are within Safaricom premises where we have CCTV cameras that capture your image for security purposes.

3.2 What Information is collected?

The information we collect and store about you depends on the nature of engagement we have with you. The list of the information we collect includes the data specified under clause 3.4.

3.3 Use of Information

Safaricom collects and processes data for the following reasons:

- 3.3.1. facilitate recruitment, transfers and promotion processes;
- 3.3.2. maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency (including beneficiary and next of kin information), and records of employee contractual and statutory rights;
- 3.3.3. operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- 3.3.4. operate and keep a record of employee performance and related processes, to plan for career development, succession planning and workforce management purposes;
- 3.3.5. operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- 3.3.6. obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- 3.3.7. operate and keep a record of other types of leave (including maternity, paternity, adoption, parental ,shared parental, study and corporate responsibility leave), to allow effective workforce management, to ensure that Safaricom complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- 3.3.8. ensure effective general HR and business administration;
- 3.3.9. provide references on request for current or former employees;

- 3.3.10. respond to and defend against legal claims;
- 3.3.11. maintain and promote equality in the workplace;
- 3.3.12. to offer security at Safaricom premises including the various car parks and inform you of any incidences related to your car;
- 3.3.13. To facilitate workforce management and shift planning;
- 3.3.14. To organise for transportation for work related travels (e.g taxi and transportation to and from the airport, intercounty travel etc);
- 3.3.15. to provide security, health and safety services in emergencies (e.g for evacuation of staff in dangerous or life threatening situations).

3.4 Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations such as those in relation to employees with disabilities. Moreover, Safaricom may also process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, which is done for the purposes of equal opportunities monitoring only and to provide anonymised statistical reports.

Where you choose to use the creche facility, we collect your child's data with your consent. This data is shared with the third party caretaker to fully equip them to handle your child.

We will routinely publish some sources of information about Safaricom that include personal data. These may include audio-visual representations of our events and/or events sponsored by us, prospectuses, annual reports, newsletters and staff profiles on the Safaricom website/ social media sites.

Categories of Data collected (List may not be exhaustive)
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Personal details:

Name, title, address, contact details including email address, telephone, date of birth, gender and age.
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Academic and Professional Qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Safaricom.
Remuneration, including entitlement to benefits such as employee share ownership plans (ESOP), medical , pensions and/or insurance cover.
Identity card, passport or huduma number
KRA PIN Number
Bank account details.
National Hospital Insurance Fund Number
Next of kin, dependants and emergency contacts.
Nationality Social Security Fund Number
Criminal record data and checks.
Schedule (days of work and working hours) and attendance at work.

Periods of leave taken including, sickness absence, family leave and the reasons for the leave.
Periods of leave taken including holiday sabbaticals, and the reasons for the leave.
Details of disciplinary or grievance procedures, any warnings issued and related correspondence.
Assessments of performance, i.e. - appraisals, performance reviews and ratings, performance improvement plans.
Medical or health information and conditions.
Name, photograph, email and Employee ID for swipe card.
Data collected in accident reports and risk assessments.
Name, telephone, vehicle details including registration number.
CCTV Images of staff.
Child information

Biometric information (fingerprint, retinal scanning and voice recognition)

3.5 Retention of Information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, the need to comply with our internal policy and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

3.6 Disclosure of Information

3.6.1 Any disclosure of your information shall be in accordance with applicable law and regulations. Safaricom shall assess and review each application for information and may decline to grant such information to the requesting party.

3.6.2 we may disclose your information to:

- a) law-enforcement agencies, regulatory authorities, courts or other public authorities in response to a demand issued with the appropriate lawful mandate and where the form and scope of the demand is compliant with the law.

- b) subsidiaries, associates, partners or agents who are involved in delivering Human resource services to you;
- c) Back ground check providers who carry out back ground checks on our behalf in the recruitment process.
- d) Third party security firms in order to provide security to you;
- e) Third party insurance firms and /or brokers in order to provide insurance services to you;
- f) Third party organisation that offers child minding services where you take your child to our creche facility;
- g) Publicly available and/or restricted government databases to verify your identity information in order to comply with regulatory requirements;
- h) Survey agencies that conduct surveys on behalf of Safaricom;
- i) Safaricom will disclose your data to third parties where this supports the administration of recruitment, your employment or where we are legally obliged to.
- j) Emergency service providers when you make an emergency call (or where such disclosure to emergency service providers is necessary for your rescue, health and safety) including your approximate location.

3.6.3 We shall not release any information to any individual or entity that is acting beyond its legal mandate.

3.6.4 We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

3.6.5 You can opt out at any time by asking us or third parties to stop sending you marketing messages at any time by writing to us or logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or contacting us at any time through the provided contacts.

3.7 Access to Information

To access and update the personal information we have on you, please log into the Safaricom Connect Portal to look at your personal information and update as desired.

3.8 Safeguarding and Protection of Information

Safaricom has put in place processes, resources, controls, tools and other adequate technical and operational measures to protect your information from unauthorised access, accidental loss or destruction.

As far as is practical, we have also put in place measures to ensure adequate technical and operational measures are implemented by any persons processing your information such as the subsidiaries, partners, agents and service providers handling your personal information in delivering any service to you.

3.10 International Data Transfers

From time to time we may need to transfer your personal information outside Kenya.

Where we send your information outside Kenya, we will make sure that your information is properly protected in accordance with the Data Protection Act, 2019

3.9. Your Rights

Subject to legal and contractual exceptions, you have rights under data protection laws in relation to your personal data. These are listed below:-

- 3.9.1. Right to be informed that we are collecting personal data about you;
- 3.9.2. Right to access personal data that we hold about you and request for information about how we process it;
- 3.9.3. Right to request that we correct your personal data where it is inaccurate or incomplete;

- 3.9.4. Right to request that we erase your personal data noting that we may continue to retain your information if obligated or entitled to do so;
- 3.9.5. Right to object and withdraw your consent to processing of your personal data. We may continue to process if we have a legitimate reason to do so;
- 3.9.6. Right to request restricted processing of your personal data noting that we may be entitled to continue processing your data and refuse your request;
- 3.9.7. Right to request transfer of your personal data in [an electronic format].

If you wish to exercise any of the rights set out above, please contact us.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within reasonable time. Occasionally it could take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

4.0. How to Contact Us

If you would like to contact us on any topics in this Data Privacy Statement, you can e-mail us on dpo@safaricom.co.ke or submit a request via the ethics hotline on Safaricom Connect Portal or to our HR helpdesk email at helpdesk2@safaricom.co.ke. If you wish to contact the Data Protection officer, below are the physical and postal contact details:

Data Protection Officer
Safaricom PLC
Safaricom House
Waiyaki Way, Westlands
P.O Box 66827, 00800 Nairobi
Tel: +254 722 00 4444

5.0. Right to Lodge Complaint

You have the right to lodge a complaint with the Data Commissioner Office in Kenya established under the Data Protection Act of Kenya 2019

6.0. Non-Compliance with this Statement

Safaricom shall have the right to terminate any agreement with you for failure to comply with the provisions of this statement and reject any application for information contrary to this statement.

7.0. Amendments to this Statement

Safaricom reserves the right to amend or modify this statement at any time. If Safaricom amends this statement, it will post any changes on Safaricom Connect and on the Safaricom career portal so that you will always know how your personal information is being used or shared.

Statement Effective Date

03 July 2020